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Pro Se

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

SANTIAGO QUEZADA, SR.,

Case No. 24-22431-shl

Debtor.

Subchapter V Chapter 11

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**APPLICATION OF ORTIZ & ORTIZ L.L.P. PURSUANT TO LOCAL
RULE 2090-1(e), TO WITHDRAW AS DEBTOR'S COUNSEL**

Ortiz & Ortiz, L.L.P. ("O & O"), counsel to Santiago Quezada, Sr. (the "Debtor"), hereby states, in support of its application to withdraw as counsel, as follows:

1. O & O has served as Debtor's counsel since his voluntary Chapter 11 case was commenced on May 14, 2024.
2. O & O can no longer represent the Debtor in the prosecution of his case. The Debtor informed the undersigned that he consents to this relief.
3. O & O may not disclose the specific reasons for its request since the information is protected by the attorney-client privilege.

RELIEF REQUESTED

4. O & O hereby requests the entry on an order permitting it to withdraw as counsel pursuant to Local Rule 2090-1(e). O & O's request is based upon Rule 1.16 of the New York Rules of Professional Conduct. Rule 1.16(c) contains a number of grounds for the permissive

withdrawal as an attorney of record. One or more of the grounds contained therein apply to the instant Application.

5. O & O requests that Notice of the Application be limited to the Office of the U.S. Trustee, the Subchapter V Trustee, any party that has filed a notice of appearance, and the Debtor's five largest creditors. Only one creditor, Maria Pizarro, has appeared and participated in the case, only five proofs of claim were filed, and the Debtor has only six unsecured creditors. O & O asserts that such notice is adequate under the circumstances of this case.

WHEREFORE, O & O requests that the Court grant the relief requested herein, and grant such other and further relief as deemed just.

Dated: March 20, 2025
New York, New York

/s/Norma E. Ortiz
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PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

SANTIAGO QUEZADA, SR.,

Case No. 24-22431-shl

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Subchapter V Chapter 11

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**ORDER GRANTING APPLICATION OF ORTIZ & ORTIZ, L.L.P., PURSUANT
TO LOCAL RULES 2090-1(e), TO WITHDRAW AS DEBTOR'S COUNSEL**

Upon the Application of Ortiz & Ortiz, L.L.P., ("O & O") pursuant to Local Rules 2090-1(d), to Withdraw as Counsel to Santiago Quezada, Sr., the above-captioned Debtor (the "Application"); notice of the Application having been provided to the Debtor, all creditors, the Subchapter V Trustee, and the U.S. Trustee; no written opposition to the Application having been filed and it appearing that sufficient notice having been given and that just cause exists to grant the relief requested in the Application; and for the reasons stated in the Application, it is hereby

ORDERED, that O & O is hereby relieved as counsel to the Debtor in the instant case and authorized to withdraw as counsel of record pursuant to Local Rule 2090-1(e).

Date: March ___, 2025
White Plains, New York

Sean H. Lane
U.S. Bankruptcy Judge